

### **III. REMARKS**

Claims 1-22 were presented, and are rejected under 35 USC 103(a) as allegedly being unpatentable over Tyburski in view of Ott et al., US Patent 5,754,674 (“Ott”) and Murdock (U.S. 5,418,864). Claims 16-19 were rejected under 35 USC 101. Applicant has herein amended claims 1, 5, 8, 13, 16, 18, 20 and 22. Claims 4, 12, 17 and 21 were canceled. No new matter is believed added.

Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

Applicant has herein amended claim 16 to include a computing device. Accordingly, Applicant submits that claims 16, 18 and 19 are statutory under 35 USC 101.

Applicant traverses the rejections of independent claims 1, 8, 16 and 20 because the cited combination fails to teach or suggest each of the claim limitations. For instance, claim 1 (and similarly claims 8, 16 and 20) recites, *inter alia*, “a character position synchronization system that utilizes the positional data stored for the plurality of characters to positionally synchronize characters from the corresponding sets of transduced character information, wherein the character position synchronization system identifies a proper position of each character in a first string of inaccurate character data having a missing or erroneously added character based on a second string of accurate character data that does not have any missing or erroneously added characters by comparing the distance values of the characters in the first string of inaccurate character data with the distance values of the second string of accurate character data.” In other words, claim 1 determines a proper position of characters in a string of inaccurate character

data by comparing distance values of characters in the string of inaccurate character data with the distance values of characters in the string of accurate character data. None of the prior art references teach or suggest such a feature. In particular, none teach determining the proper position of characters in string based on the characters in a second string using distance values representing a distance from the character to a predetermined location on a document. For this reason, Applicant submits that the independent claims are allowable over the art of record.

The above reference features were previously presented in canceled claims 4, 12, 17 and 21, which were rejected because Ott allegedly teaches providing X-Y coordinate measures. However, Applicant submits that even if this is *arguendo* true, the proposed combination does not teach or suggest comparing **distance values** among characters in two strings to determine the proper position of the characters. As noted in the current Office Action, Tyburski does not suggest positional data. While Murdock teaches the use of position information for synchronization, it does not teach or suggest the use of distance values. Instead, it explicitly teaches examining characters that surround a questionable character in a string to synchronize two strings. Questionable characters in the two strings are subjected to a character substitution ratio process (see, e.g., column 9). For instance, a first string may have three questionable characters and a second string may have two. Based on the 3:2 ratio and the questionable characters, Murdock makes an error determination. Accordingly, Murdock teaches examining only the character information in the strings themselves to synchronize strings. Murdock makes no teaching or suggestion of using distance values as claimed herein. Because Murdock achieves synchronization by examining characters surrounding questionable characters and ratios, there would be no motivation to utilize distance values to synchronize multiple strings. None of the references provide any suggestion or motivation for such a combination.

Accordingly, Applicant submits that claim 1 (and similarly claims 8, 16 and 20) are allowable over the cited art.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features.

Applicant respectfully submits that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael F. Hoffman". It is written in a cursive style with a horizontal line through it.

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Michael F. Hoffman  
Reg. No. 40,019

Dated: 1/21/09

Hoffman Warnick LLC  
75 State Street  
Albany, NY 12207  
(518) 449-0044 - Telephone  
(518) 449-0047 - Facsimile